

The Hon. Ricardo S. Martinez



08-CV-01381-BR

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

\$293,200.00 IN U.S. CURRENCY,
more or less, and all proceeds therefrom,
Defendant.

NO. CV08-1381-RSM

**STIPULATED SETTLEMENT
AGREEMENT**

IT IS HEREBY STIPULATED between the United States of America, by and through Jenny A. Durkan, United States Attorney for the Western District of Washington, and Richard Cohen, Assistant United States Attorney for said District, and Claimant Matthew Krane, *Pro Se*, to a settlement of all claims to the following property:

a. \$293,200.00 in United States currency, more or less; ("the defendant currency"), which is the defendant in the current in rem civil forfeiture action.

This Stipulated Settlement Agreement is entered into between the parties pursuant to the following stipulated terms:

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1 1. On September 15, 2008, the United States filed a Verified Complaint for
2 Forfeiture in rem against the above listed defendant currency pursuant to 31 U.S.C. §
3 5317(c)(1)(A), based on alleged violations of 31 U.S.C. §5324(a)(1). *See* Docket No. 1.

4 2. On February 17, 2009, Matthew Krane filed a timely claim to the defendant
5 currency. *See* Docket No. 10.

6 3. On June 1, 2009, Matthew Krane filed an Answer to the United State's
7 Complaint. *See* Docket No. 16.

8 4. On December 10, 2009, Matthew Krane entered into plea agreements with
9 the United States in two criminal cases, *United States v. Jeffrey I. Greenstein, et al.*,
10 Criminal No. CR08-296 RSM, and *United States v. Matthew Krane*, Criminal No. CR09-
11 391 RSM. *See* CR08-296 Docket No. 89 and CR09-391 Docket No. 9. The charges to
12 which Matthew Krane pleaded guilty were not the violations upon which this current
13 forfeiture action in rem is based. *Id.*

14 6. On March 19, 2010, the United States and Matthew Krane jointly stipulated
15 and requested that the Court strike the trial date and transfer the case to the Honorable
16 Ricardo S. Martinez, to whom the above-referenced criminal matters are assigned. *See*
17 Docket No. 19.

18 7. On March 22, 2010, the Court entered an Order Striking the Trial Date and
19 Transferring the Civil Action. *See* Docket No. 20.

20 8. Claimant Matthew Krane hereby agrees and stipulates to withdraw his
21 claim to the defendant \$293,200.00 in United States currency, more or less, and to the
22 forfeiture of the defendant \$293,200.00 in United States currency, more or less, to the
23 United States.

24 9. Claimant Matthew Krane understands and agrees that by entering into this
25 Settlement Agreement, he waives any rights to litigate further any interest or to petition
26 for remission or mitigation of the forfeiture of the currency listed in paragraph a.

27 10. Claimant Matthew Krane agrees to release and hold harmless the United
28 States, the United States Department of Justice, the United States Department of

1 Treasury, and employees of the United States, acting in their individual or official
2 capacities, from any and all claims by Matthew Krane and/or his agents, heirs, successors,
3 and assigns, which currently exist or which may arise as a result of the seizure of the
4 defendant currency and the forfeiture actions against the properties listed above.

5 11. All parties agree to bear their own costs and attorney's fees.

6 Respectfully submitted,

7 JENNY A. DURKAN
8 United States Attorney

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11 DATED: June 10, 2011



12 RICHARD E. COHEN
13 Assistant United States Attorney
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15 Seattle, Washington 98101
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17 Fax: (206) 553-6934
18 Email: Richard.E.Cohen@usdoj.gov

19
20
21 DATED: 6/10/11



22 MATTHEW KRANE, *Pro Se*
23 Claimant

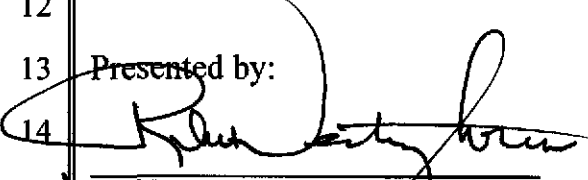
ORDER

This Stipulation Agreement in which Claimant Matthew Krane withdraws his claim in the current Civil Forfeiture Action *in rem* as to the defendant \$293,200.00 in United States currency, more or less is hereby approved.

DATED this 10 day of June, 2011.


RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented by:


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CERTIFICATE OF SERVICE

I hereby certify that on June , 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney of record for the claimant(s). I further certify that I served the following individual by U.S. Mail and/or email:

Mr. Matthew G. Krane
1451 N. Kings Road
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s/ Michael McLaren

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